

1 CALIFORNIA PUBLIC UTILITIES COMMISSION

2 Arocles Aguilar (SBN 94753)

3 Geoffrey Dryvynsyde (SBN 139884)

4 Candace Morey (SBN 233081)

5 505 Van Ness Avenue

6 San Francisco, California 94102

7 Telephone: (415) 703-2015

8 Facsimile: (415) 703-2262

9 Email: arocles.aguilar@cpuc.ca.gov

10 geoffrey.dryvynsyde@cpuc.ca.gov

11 candace.morey@cpuc.ca.gov

12 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

13 Alan W. Kornberg (*pro hac vice*)

14 Brian S. Hermann (*pro hac vice*)

15 Walter R. Rieman (SBN 139365)

16 Sean A. Mitchell (*pro hac vice*)

17 Neal P. Donnelly (*pro hac vice*)

18 1285 Avenue of the Americas

19 New York, New York 10019

20 Telephone: (212) 373-3000

21 Facsimile: (212) 757-3990

22 Email: akornberg@paulweiss.com

23 bhermann@paulweiss.com

24 wrieman@paulweiss.com

25 smitchell@paulweiss.com

26 ndonnelly@paulweiss.com

27 *Attorneys for the California Public Utilities Commission*

28  
UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY**

**Debtors.**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

Case Nos. 19 - 30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**AMENDED NOTICE OF ENTRY OF  
APPEARANCE AND DEMAND FOR  
NOTICES AND PAPERS**

**[No Hearing Requested]**

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3 **PLEASE TAKE NOTICE** that the California Public Utilities Commission (the  
4 “Commission”) enters its appearance by and through its counsel, Arocles Aguilar, Geoffrey  
5 Dryvynsyde, Candace Morey and Paul, Weiss, Rifkind, Wharton & Garrison LLP, pursuant to  
6 section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy  
7 Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy  
8 Rules”), and hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b)  
9 of the Bankruptcy Code, that the names of the undersigned representatives be added to the  
10 mailing list maintained by the Clerk in the above-captioned chapter 11 cases (the “Chapter 11  
11 Cases”), and that the Clerk and all other parties in interest in the Chapter 11 Cases provide all  
12 notices and all papers served on any party, filed with the Court or delivered to the Office of the  
13 United States Trustee in the Chapter 11 Cases, to all of the persons listed directly below:

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Sean A. Mitchell (*pro hac vice*)  
Neal P. Donnelly (*pro hac vice*)  
1285 Avenue of the Americas  
New York, New York 10019-6064  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990  
Email: akornberg@paulweiss.com  
bhermann@paulweiss.com  
wrieman@paulweiss.com  
smitchell@paulweiss.com  
ndonnelly@paulweiss.com

1                   **PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the  
2 Bankruptcy Code, the foregoing demand includes not only all of the notices and papers referred  
3 to in the Bankruptcy Rules specified above but also includes, without limitation, notices of any  
4 orders, pleadings, motions, applications, complaints, demands, hearings, reports, requests or  
5 petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing  
6 and any other document brought before this Court with respect to the Chapter 11 Cases and any  
7 proceeding therein, whether formal or informal, whether written or oral, and whether transmitted  
8 or conveyed by mail, electronic mail, delivery, telephone, telegraph, telecopier, telex, or  
9 otherwise filed or given with regard to the Chapter 11 Cases and the proceedings therein, all of  
10 which shall be sent to all of the persons listed above.

11                   **PLEASE TAKE FURTHER NOTICE** that neither this Amended Notice of  
12 Appearance nor any subsequent appearance, pleading, proof of claim, claim or suit is intended or  
13 shall be deemed or construed as:

14                   (a) a consent by the Commission to the jurisdiction of this Court or any other  
15 court with respect to proceedings, if any, commenced in any case against or otherwise involving  
16 the Commission;

17                   (b) a waiver of any right of the Commission to (i) have an Article III judge  
18 adjudicate in the first instance any case, proceeding, matter or controversy as to which a  
19 Bankruptcy Judge may not enter a final order or judgement consistent with Article III of the  
20 United States Constitution, (ii) have final orders in non-core matters entered only after *de novo*  
21 review by a District Court Judge, (iii) trial by jury in any proceeding so triable in the Chapter 11  
22 Cases or in any case, controversy, or proceeding related to the Chapter 11 Cases, (iv) have the  
23 United States District Court withdraw the reference in any matter subject to mandatory or  
24 discretionary withdrawal, or (v) any and all rights, claims, actions, defenses, setoffs,  
25 recoupments or remedies to which the Commission is or may be entitled under agreements, in  
26 law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are  
27 expressly reserved hereby; or  
28

1 (c) a waiver of any objections or defenses that the State of California, the  
2 Commission or any other agency, unit or entity of the State of California may have to this  
3 Court's jurisdiction over the State of California, the Commission or such other agency, unit or  
4 entity based upon the Eleventh Amendment to the United States Constitution or related  
5 principles of sovereign immunity or otherwise, all of which objections and defenses are hereby  
6 reserved.

7 **PLEASE TAKE FURTHER NOTICE** this Amended Notice of Appearance  
8 shall not be deemed to constitute consent to electronic service of any pleading or papers for  
9 which mailed or personal service is required under the applicable Bankruptcy Rules or Federal  
10 Rules of Civil Procedure.

11 Dated: August 26, 2019

CALIFORNIA PUBLIC UTILITIES COMMISSION

12  
13 By: /s/ Candace Morey  
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[bhermann@paulweiss.com](mailto:bhermann@paulweiss.com)  
[wrieman@paulweiss.com](mailto:wrieman@paulweiss.com)  
[smitchell@paulweiss.com](mailto:smitchell@paulweiss.com)  
[ndonnelly@paulweiss.com](mailto:ndonnelly@paulweiss.com)

*Attorneys for the California Public Utilities  
Commission*